

## **Exhibit 29**

# **PLAINTIFF HARFORD COUNTY BOARD OF EDUCATION OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (HARFORD) (SD MSJ NO. 6)**

Case No.: 4:22-md-03047-YGR

MDL No. 3047

Member Case No.: 4:23-cv-03065-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: SOCIAL MEDIA ) Case No.  
ADOLESCENT ADDICTION/ ) 4:22-MD-03047-YGR  
PERSONAL INJURY PRODUCTS )  
LIABILITY LITIGATION, ) MDL No. 3045  
-----

This Document Relates to: )  
)  
Board of Education of )  
Harford County v. Meta )  
Platforms Inc., et al. )  
)  
Case No.: 4:23-cv-03065 )  
Platforms Inc., et al. )  
-----

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER  
May 29, 2025  
2:03 p.m. EDT

Deposition of ANDREW MOORE, held remotely,  
before Suzanne J. Stotz, a Certified Shorthand  
Reporter License No. 14565, Certified Realtime  
Reporter, Registered Professional Reporter, and  
a Notary Public of the State of California.

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1 A P P E A R A N C E S:

2  
3 FOR THE PLAINTIFF:

4 (Via Videoconference)

BROCKSTEDT MANDALAS FEDERICO LLC

5 2850 Quarry Lake Drive, Suite 220

Baltimore, Maryland 21209

6 (410) 881-8418

mlegg@bmbfclaw.com

7 BY: MATTHEW P. LEGG, ESQ.

8 (Via Videoconference)

LIEFF CABRASER HEIMANN & BERNSTEIN LLP

9 275 Battery Street, 29th Floor

San Francisco, California 94111

10 (415) 956-1000

nlee@lchb.com

11 BY: NICHOLAS LEE, ESQ.

12  
13 FOR THE DEFENDANTS META PLATFORMS, INC. f/k/a  
14 FACEBOOK, INC.; INSTAGRAM, LLC; FACEBOOK  
15 PAYMENTS, INC.; FACEBOOK OPERATIONS, LLC; and  
SICULUS, INC.:

16 (Via Videoconference)

SHOOK, HARDY & BACON L.L.P.

2555 Grand Boulevard

17 Kansas City, Missouri 64108

(816) 474-6550

18 wwalberg@shb.com

19 BY: WILLIAM S. WALBERG, ESQ.

20 (Via Videoconference)

SHOOK, HARDY & BACON L.L.P.

2001 Market Street, Suite 3000

21 Philadelphia, Pennsylvania 19103

(215) 278-2555

22 eflaster@shb.com

23 BY: EBEN S. FLASTER, ESQ.  
24  
25

CONFIDENTIAL

Page 3

1 A P P E A R A N C E S: (Continued)

2  
3 FOR THE DEFENDANT SNAP, INC.:

4 (Via Videoconference)

KIRKLAND & ELLIS LLP

5 200 Market Street, Suite 1000

Philadelphia, Pennsylvania 19103

6 (215) 268-5002

teddy.murphy@kirkland.com

7 BY: TEDDY MURPHY, ESQ.

8  
9 FOR THE DEFENDANTS YOUTUBE, LLC, GOOGLE LLC,  
and ALPHABET INC.:

10 (Via Videoconference)

11 WILLIAMS & CONNOLLY LLP

680 Maine Avenue, SW

12 Washington, DC 2024

(202) 434-5000

13 akeyes@wc.com

lweiant@wc.com

14 BY: J. ANDREW KEYES, ESQ.

BY: LYDIA A. WEIANT, ESQ.

15  
16 FOR THE DEFENDANTS TIKTOK INC., BYTEDANCE INC.,  
17 BYTEDANCE LTD., TIKTOK LTD., and TIKTOK, LLC:

18 (Via Videoconference)

KING & SPALDING LLP

19 621 Capitol Mall, Suite 1500

Sacramento, California 95814

20 (916) 321-4800

mrowan@kslaw.com

21 BY: MATTHEW ROWAN, ESQ.

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A P P E A R A N C E S: (Continued)

ALSO PRESENT:

LAUREN R. DRIVE, Deputy General Counsel  
Harford County Public Schools

WILLIAM CHAN, Videographer

BRIAN FRONZAGLIA, Trial Technician

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I N D E X

EXAMINATION

Page No.

ANDREW MOORE

BY MR. KEYES

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E X H I B I T S

Exhibit

Description

Page No.

Moore

Exhibit 1

Defendants' Notice of  
Continued Oral and  
Videotaped Deposition  
of Drew Moore

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Moore

Exhibit 2

Plaintiff Board of  
Education of Harford  
County's Amended  
Objections and  
Responses to  
Defendants'  
Interrogatories (Set  
3)

12

Moore

Exhibit 3

Expert report of  
Jeffrey E. Meyers  
dated May 19, 2025

29

(Exhibits attached to transcript.)

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1 THE VIDEOGRAPHER: We are now on  
2 the record. My name is William Chan, I am  
3 a videographer for Golkow. A Veritext  
4 division.

5 Today's date is Thursday, May 29,  
6 2025. The time is 2:03 p.m. Eastern.

7 This remote video deposition is  
8 being held in the matter of Board of  
9 Education of Harford County versus Meta  
10 Platforms, Inc., et al. for the United  
11 States District Court, Northern District  
12 of California. The deponent is Andrew  
13 Moore.

14 All parties to this deposition are  
15 appearing remotely and have agreed to the  
16 witness being sworn in remotely. Due to  
17 the nature of remote reporting, please  
18 pause briefly before speaking to ensure  
19 all parties are heard completely.

20 Counsel will be noted on the  
21 stenographic record.

22 The court reporter is Suzanne Stotz  
23 and will now swear in the witness.

24 ///

25 ///

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1                   A N D R E W     M O O R E ,  
2     having first been duly sworn by a Notary  
3     Public, was examined and testified as follows:

4                   EXAMINATION

5     BY MR. KEYES:

6                 Q.         Good afternoon, Mr. Moore. We've  
7     met before. As you know, my name is Andrew  
8     Keyes. I am with the law firm of Williams &  
9     Connolly. And we represent the Google and  
10    YouTube defendants in this case.

11                Would you please state your name  
12    for the record?

13                A.         Andrew Moore.

14                Q.         And do you understand that you are  
15    under oath today?

16                A.         I do.

17                Q.         Do you understand that you are  
18    under oath in giving testimony as if you were  
19    in a courtroom before a judge and a jury?

20                A.         I do.

21                Q.         And do you understand that you are  
22    testifying as a corporate representative of  
23    Harford County Public Schools on a particular  
24    topic?

25                A.         I do.



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1 Q. Is there any reason you cannot  
2 testify truthfully and accurately today?

3 A. No, sir.

4 Q. This deposition is being conducted  
5 remotely by Zoom.

6 Where are you physically located  
7 now?

8 A. Bel Air, Maryland.

9 Q. And where in Bel Air, Maryland are  
10 you?

11 A. 102 South Hickory Avenue in our  
12 central office location.

13 Q. Is there anyone in the room with  
14 you?

15 A. No, sir.

16 Q. Do you have any notes with you?

17 A. Not on this topic that we're about  
18 to discuss.

19 Q. And are you connected to any  
20 communications device such that you can speak  
21 with anyone electronically during this  
22 deposition?

23 A. There is nothing live. I do have a  
24 cell phone and a landline in my office.

25 Q. Okay. Do you have any other

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1 electronic device turned on and accessible to  
2 you such that you could receive messages during  
3 the course of the deposition?

4 A. Only the computer in which this  
5 Zoom call is being conducted.

6 Q. Did you do anything to prepare for  
7 today's deposition?

8 A. I spoke briefly to our legal  
9 counsel yesterday.

10 Q. Did you do anything else?

11 A. No, sir.

12 Q. Who is the legal counsel you spoke  
13 with briefly yesterday?

14 A. Matt Legg.

15 Q. Anyone else?

16 A. Mr. Nick Lee.

17 Q. Anyone else?

18 A. Lauren Driver, who is our internal  
19 legal counsel.

20 Q. Did anyone participate in your prep  
21 session yesterday besides you, Mr. Legg, Mr.  
22 Lee, and Ms. Driver?

23 A. No, sir.

24 Q. How long was that prep session with  
25 the lawyers?

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1 A. Maybe 40 minutes.

2 Q. Was it in person?

3 A. No, sir.

4 Q. Was it by Zoom?

5 A. Yes, sir.

6 Q. Okay. Did you review any documents  
7 during that prep session with the lawyers?

8 A. No, sir.

9 Q. Did you review any documents to  
10 prepare for today's deposition outside of your  
11 prep session with the lawyers?

12 A. No, sir.

13 Q. Did you speak with anybody besides  
14 the lawyers to prepare for today's deposition?

15 A. No, sir.

16 Q. Did you review the transcript of  
17 deposition testimony that you gave earlier in  
18 the case?

19 A. No, sir.

20 Q. Did you review the transcript of  
21 any deposition testimony given by anyone else  
22 in this case?

23 A. No, sir.

24 Q. You joined Harford County Public  
25 Schools in 2000?

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1 A. Correct.

2 Q. And since 2000 you served as the  
3 director of technology?

4 A. Yes, sir.

5 Q. And you've worked continuously for  
6 Harford County Public Schools since 2000 as the  
7 director of technology?

8 A. Yes, sir.

9 MR. KEYES: Brian, would you pull  
10 up Tab 1, which we'll mark as Moore  
11 Exhibit 1?

12 (Whereupon, Moore Exhibit 1,  
13 Defendants' Notice of Continued Oral and  
14 Videotaped Deposition of Drew Moore, was  
15 marked for identification.)

16 BY MR. REYES:

17 Q. Mr. Moore, do you see that on your  
18 screen?

19 A. I do.

20 Q. Have you seen this Notice of  
21 Continued Oral and Videotaped Deposition of  
22 Drew Moore before?

23 A. Yes.

24 Q. Okay. And if you'd look on the  
25 first page, which is on the screen, lines 15

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1 through 18, do you see that you have been  
2 designated as the Board of Education of Harford  
3 County's corporate representative on the weight  
4 percentage that was selected for the Office of  
5 Technology & Information and used as the  
6 allocation percent in plaintiffs' expert  
7 Jeffrey Meyers' calculations?

8 A. I do see that, sir.

9 Q. And are you prepared to answer  
10 questions on that topic?

11 A. Yes.

12 Q. Okay.

13 A. To the best of my ability.

14 Q. Great.

15 MR. KEYES: Brian, would you pull  
16 up Tab 6? And we'll mark this as Moore  
17 Exhibit 2.

18 (Whereupon, Moore Exhibit 2,  
19 Plaintiff Board of Education of Harford  
20 County's Amended Objections and Responses  
21 to Defendants' Interrogatories (Set 3),  
22 was marked for identification.)

23 BY MR. KEYES:

24 Q. Do you see Moore Exhibit 2 on the  
25 screen?

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1 A. Yes, sir.

2 Q. This is a document titled Plaintiff  
3 Board of Education of Harford County's Amended  
4 Objections and Responses to Defendants'  
5 Interrogatories (Set 3).

6 And if you'd like, Mr. Moore, we  
7 can scroll through it slowly. My question is,  
8 have you seen this document before today's  
9 deposition?

10 A. I don't recall this one. I think  
11 the only document I reviewed was the one that  
12 was the notice that I would be deposed.

13 Q. Okay.

14 MR. KEYES: So, Brian, would you  
15 just slowly scroll through this.

16 THE WITNESS: I have definitely not  
17 seen this.

18 BY MR. KEYES:

19 Q. Okay. This exhibit includes an  
20 Attachment A on page 7. And the first part of  
21 Attachment A is this worksheet titled  
22 Program/Department Worksheet. Do you see that?

23 A. Yes.

24 Q. Have you seen this worksheet before  
25 today?

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1 A. No, sir.

2 Q. Okay. If you look to the left-hand  
3 column, it's titled Relevant  
4 Department/Program. Do you see that?

5 A. Yes, sir.

6 Q. And there are 21 departments or  
7 programs listed. And the last one listed is  
8 the Office of Technology & Information?

9 A. Yes, sir.

10 Q. Do you work in that office?

11 A. Yes, sir.

12 Q. Are you the head of that office?

13 A. I am the director of technology.

14 Q. Okay.

15 A. Which would -- yes, for all  
16 intents --

17 Q. As the director of technology, are  
18 you the head of the Office of Technology &  
19 Information?

20 A. Yes, sir.

21 Q. And then if you look to the right,  
22 there is another column titled Weight  
23 Percentage. Do you see that?

24 A. Yes, sir.

25 Q. And there is a 20 percent weight

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1 percentage listed on the same line as the  
2 Office of Technology & Information. Do you see  
3 that?

4 A. Yes, sir.

5 Q. Have you seen an excerpt of this  
6 worksheet that lists a 20 percent weight  
7 percentage for the Office of Technology &  
8 Information before today's deposition?

9 A. No, sir.

10 Q. In the past have you picked a 20  
11 percent weight percentage for the Office of  
12 Technology & Information?

13 A. Relative to what, sir?

14 Q. Well, relative to this case?

15 A. You would have to be more specific,  
16 sir.

17 Q. Well, do you know how this 20  
18 percent weight percentage was selected for the  
19 Office of Technology & Information?

20 A. I can share that I provided a  
21 weight based on the amount of time that was  
22 asked that we spend on social media-related  
23 events that come to our attention. I was not  
24 informed of it being applied to a dollar value.

25 Q. Okay. So have you seen any



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1 document, besides the page on this screen, that  
2 lists a 20 percent weight percentage for the  
3 Office of Technology & Information?

4 A. No, sir.

5 Q. Okay. When did you provide the 20  
6 percent weight percentage based on the amount  
7 of time your office spends on social  
8 media-related events that come to your  
9 attention?

10 A. Six, eight weeks ago.

11 Q. And who did you supply that weight  
12 percentage to?

13 A. Lauren Driver, our internal legal  
14 counsel.

15 Q. Why did you provide that percentage  
16 to Ms. Driver?

17 A. She requested it.

18 Q. Okay. And then can you explain to  
19 me how you arrived at that 20 percent weight  
20 percentage?

21 A. Sure. I have two individuals that  
22 are the primary contact for such events. I  
23 went to them and I said on an average could you  
24 tell me how many events in a given week you are  
25 contacted with to investigate or deal with

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1 issues related to social media and students  
2 based on their number, and then I asked them  
3 how much time would you spend on a given event.  
4 And that's how I came to about 20 percent of  
5 their workweek.

6 Q. Were you finished with your  
7 explanation of how you arrived at the 20  
8 percent weight percentage?

9 A. Yes, sir.

10 Q. Okay. You mentioned two  
11 individuals who work for you who deal with such  
12 events. Who are those individuals?

13 A. I have a network security engineer  
14 and a desktop administrator.

15 Q. And what is the name of the network  
16 security engineer?

17 A. Mark Schoen, S-C-H-O-E-N.

18 Q. And what is the name of the  
19 desktop -- what is the title you gave me,  
20 desktop?

21 A. Desktop administrator.

22 Q. Administrator. What is the name of  
23 the desktop administrator?

24 A. Christopher Long.

25 Q. Okay. What does Mark Schoen do as

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1 the network security engineer?

2 A. He is responsible for all network  
3 security-related responsibilities, firewall,  
4 content filter, ensure security of our network.

5 Q. You mentioned the firewall and a  
6 content filter. What is the difference between  
7 those two?

8 A. So firewall is typically a hardware  
9 device that allows you to block certain  
10 communications through our hardwired network or  
11 our wifi network. A content filter is looking  
12 at all content and then filtering out URLs or  
13 websites.

14 Q. And what does Christopher Long do  
15 as the desktop administrator?

16 A. He is responsible for all desktop  
17 operations, all software that is to be loaded  
18 onto student or staff devices, and maintains  
19 those environments from a central office  
20 administration control.

21 Q. And when you said that these are  
22 the two individuals who handle such events,  
23 what events are you referring to?

24 A. A typical event would be a  
25 principal would contact one of them and state

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1 that an individual has been able to access a  
2 social media site; and with the understanding  
3 that these sites are blocked, how is this  
4 possible. And then we would go in and then we  
5 would ask who was the student, what time, what  
6 day. And then we would go back and we would  
7 look through logs. They would verify that that  
8 student was on that particular device at that  
9 particular moment. And then the investigation  
10 could go beyond that, depending on what the  
11 event is. But that would be typically the  
12 beginning of such action.

13 Q. Okay. And then you said you asked  
14 each of them, Mr. Schoen and Mr. Long, how many  
15 events in a given week they had where they  
16 investigated or dealt with something related to  
17 social media issues; did I get that right?

18 A. That's correct.

19 Q. And are you then referring to  
20 instances where someone in the school system  
21 reports that someone is doing some kind of end  
22 run around either the firewall or the internet  
23 content filter to get access to a site?

24 A. That could be one event.

25 Q. Okay. And so what did Mr. Schoen

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1 report back to you in terms of how many such  
2 events he handles per week?

3 A. Approximately four.

4 Q. And what did Mr. Long report to you  
5 about how many such events he handles per week?

6 A. A similar number.

7 Q. Okay. What did Mr. Schoen tell you  
8 about how much time they spend per event?

9 A. 60 to 120 -- well, yeah, an hour to  
10 two hours per event on average. On average,  
11 sir.

12 Q. On average, okay.

13 And what did Mr. Long report to you  
14 about how much time is spent per event?

15 A. A similar amount.

16 Q. Okay. So if I understand you  
17 correctly, you reached out to Mr. Schoen and  
18 Mr. Long, you said, hey, how much time per week  
19 on average do you spend investigating or  
20 dealing with issues relating to student access  
21 to social media; they each then provided an  
22 estimate of roughly four events per week on  
23 average, and they each said that they spend 60  
24 to 120 minutes on average per event; did I get  
25 that right?

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1 A. Yes, sir.

2 Q. Okay. And then you figured out  
3 that if they're spending 60 to 120 minutes per  
4 event and there are roughly four events for  
5 each of them per week, that 20 percent of their  
6 time was spent on this topic?

7 A. Yes, sir.

8 Q. Okay. Did you create any documents  
9 over the course of this work, reached out to  
10 them or getting their answers or running  
11 calculations to arrive at this 20 percent  
12 weight percentage?

13 A. No, sir.

14 Q. After you arrived at the 20 percent  
15 weight percentage, did you run that by either  
16 Mr. Schoen or Mr. Long for a gut check on  
17 whether that seemed right?

18 A. No, sir.

19 Q. Did you run it by anyone else to  
20 get their input on whether this 20 percent  
21 weight percentage seemed right?

22 A. No, sir.

23 Q. Did you consult any other documents  
24 to evaluate whether the 20 percent weight  
25 percentage that you had estimated seemed right?

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1 A. No, sir.

2 Q. Okay. They work in the Office of  
3 Technology & Information; is that correct?

4 A. Who are "they"?

5 Q. Mr. Schoen and Mr. Long.

6 A. Yes, sir.

7 Q. Okay. And do they report directly  
8 to you?

9 A. No, sir.

10 Q. Who do they report to?

11 A. Each of them report to a separate  
12 team leader that reports to me.

13 Q. Okay. And who is the team leader  
14 that Mr. Schoen reports to?

15 A. William Waldrup, W-A-L-D-R-U-P.

16 Q. And Mr. Waldrup reports to you?

17 A. Correct.

18 Q. And to whom does Mr. Long report?

19 A. Jason Wilkinson.

20 Q. And does Mr. Wilkinson report to  
21 you?

22 A. Yes, sir.

23 Q. Are there other people who work in  
24 the Office of Technology & Information?

25 A. Yes, sir.

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1 Q. Okay. Obviously there is you,  
2 there is Mr. Waldrup, Mr. Wilkinson, Mr.  
3 Schoen, and Mr. Long, that's five people. How  
4 many other people work in the Office of  
5 Technology & Information?

6 A. I think we have 53 in our  
7 department.

8 Q. And do the other 52 all report up  
9 to you directly or indirectly?

10 A. Directly or indirectly.

11 Q. That's a yes?

12 A. Yes.

13 Q. Okay. How many of the other 52  
14 report up to Mr. Waldrup roughly?

15 A. Ten.

16 Q. And how many of the 52 report up to  
17 Mr. Wilkinson?

18 A. 20, 21.

19 Q. And then are there other people,  
20 besides Mr. Waldrup and Mr. Wilkinson, who are  
21 your direct reports?

22 A. Direct reports, yes.

23 Q. How many other direct reports do  
24 you have?

25 A. Two.



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1 Q. Who are they?

2 A. My admin assistant and another team  
3 leader.

4 Q. When you say "another team leader,"  
5 are you referring to Mr. Waldrup and Mr.  
6 Wilkinson as team leaders?

7 A. Yes, sir.

8 Q. Okay. Who is the third team  
9 leader, besides Mr. Waldrup and Mr. Wilkinson?

10 A. Matthew Payne.

11 Q. And how many of the other 52 people  
12 in this department report up to Mr. Payne?

13 A. Give me a second. I'm counting  
14 through my department.

15 Q. Sure.

16 A. 11.

17 Q. So there are roughly ten people who  
18 report up to Mr. Waldrup, roughly 20 people who  
19 report up to Mr. Wilkinson, roughly 11 people  
20 who report up to Mr. Payne, and you have an  
21 administrative assistant. Does that account  
22 for everybody in your department or are there  
23 others who fall somewhere else in the  
24 department?

25 A. That accounts for everyone. My

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1 numbers are probably slightly off.

2 Q. Okay.

3 A. But I'm just going by --

4 Q. Is it fair to say that the  
5 department is comprised of you, your  
6 administrative assistant, the three team  
7 leaders, and then the people who report to the  
8 three team leaders?

9 A. Yes, sir.

10 Q. Okay. So you gave me an example of  
11 how Mr. Schoen or Mr. Long spends time that  
12 counted as an event for purposes of your 20  
13 percent weight percentage calculation, right?

14 A. Yes, sir.

15 Q. Can you give me the others that  
16 would fall within that event category?

17 A. I could not give you specifics.

18 Q. Okay. But generally you have this  
19 20 percent weight percentage that is an  
20 approximation or the time that Mr. Schoen and  
21 Mr. Long spent on events related to social  
22 media used by students?

23 A. Correct.

24 Q. And you've explained that one  
25 instance is where someone will complain to Mr.

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1 Schoen or Mr. Long that a student is on some  
2 kind of end run around the firewall, the  
3 internet content filter to get access to social  
4 media. Are there other kinds of events that  
5 fall within this 20 percent weight percentage?

6 A. There would be other variants of  
7 such event.

8 Q. What are those variants?

9 A. It's generally social media  
10 site-related, but it could be someone -- there  
11 was a rumor that someone posted personal  
12 information, can you verify that for us, that  
13 would be maybe another event. There are a  
14 multitude of events that we are asked to look  
15 into over the course of a week.

16 Q. Okay. So that the 20 percent  
17 weight percentage includes time that they may  
18 spend taking additional steps based on some  
19 kind of content posted by a student on social  
20 media?

21 A. It could be.

22 Q. Okay. So one is investigating how  
23 a student is doing some kind of end run around  
24 the internet content filter, another one is to  
25 taking steps to look into content that a

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1 student has posted on social media. Is there  
2 another category of social media-related events  
3 that you are capturing in this 20 percent  
4 weight percentage?

5 MR. LEGG: Objection to form and  
6 foundation.

7 Go ahead.

8 THE WITNESS: So going back to my  
9 first deposition that I referred to  
10 actions as walkables and that would be the  
11 various variants. So you are putting out  
12 one and another one pop up. It might be  
13 slightly different or it could be very  
14 similar. It could be that we have found  
15 proxy sites that students have found and  
16 we have to go in and we have to block that  
17 site. Most of it centers around items  
18 that disrupt the instructional  
19 environment.

20 BY MR. KEYES:

21 Q. Okay. So if a student had used a  
22 proxy website to do an end run around Harford  
23 County Public Schools' internet content filter  
24 and they were using that to access, let's say,  
25 a video gaming website, and someone in the

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1 administration brought that to Mr. Schoen or  
2 Mr. Long's attention and they spent time on  
3 that, would that be captured in your 20 percent  
4 weight percentage calculations?

5 A. It could be.

6 Q. Okay. And if students used a proxy  
7 to do an end run around the internet content  
8 filter to reach other websites that are not  
9 video gaming, not social media, and that was  
10 brought to Mr. Schoen or Mr. Long's attention,  
11 those events would also be included in the 20  
12 percent weight calculation?

13 A. I could not say that for certain.

14 Q. Why not?

15 A. My direct question to them was  
16 items that had social media focused event. So  
17 we're not -- I was not asking them to give me  
18 how much time you spend blocking, you know, a  
19 weapons site let's say, that would be something  
20 that we would block as well. I was --

21 Q. Well --

22 A. -- items that -- the time that you  
23 spent on social media-related events.

24 Q. When you got the estimates from Mr.  
25 Schoen and Mr. Long where they said about four

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1 events per person per week, did you ask them  
2 again are you only including events that relate  
3 to social media?

4 A. I did not ask that follow-up  
5 question.

6 MR. KEYES: Brian, would you pull  
7 up Tab 7? And we'll mark this as Moore  
8 Exhibit 3.

9 (Whereupon, Moore Exhibit 3, Expert  
10 report of Jeffrey E. Meyers dated May 19,  
11 2025, was marked for identification.)

12 BY MR. KEYES:

13 Q. This is the expert report of  
14 Jeffrey E. Meyers dated May 19, 2025 in this  
15 case. Mr. Moore, have you seen this expert  
16 report?

17 A. No.

18 Q. Okay.

19 MR. KEYES: Brian, if you go to the  
20 last page of Moore Exhibit 3.

21 BY MR. KEYES:

22 Q. This is Appendix C to Mr. Meyers'  
23 report. And it lists here some third-party  
24 vendors. Do you see that?

25 A. Yes, sir.

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1 Q. It lists two of them, it lists  
2 Skyline Network and then CDW Government, Inc.  
3 Do you see that?

4 A. Yes, sir.

5 Q. Is Skyline Network the vendor that  
6 provides Palo Alto internet content filtering  
7 software?

8 A. It is the vendor in which we  
9 procure the Palo Alto through.

10 Q. So you get the Palo Alto internet  
11 content filtering software from Skyline  
12 Network?

13 A. We receive the device through a  
14 contract which Skyline Network has with the  
15 State of Maryland.

16 Q. And then Cisco Umbrella is also an  
17 internet content filter?

18 A. It is an end point filtering piece  
19 of software.

20 Q. And do you get that through from  
21 CDW Government, Inc.?

22 A. We purchased it through CDW. They  
23 also had a contract vehicle in the State of  
24 Maryland which we could purchase it.

25 Q. Okay. And then when Harford County

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1 Public Schools spends money on Palo Alto, are  
2 those dollars that are funded in whole or in  
3 part by the State of Maryland?

4 A. Restate your question please.

5 Q. Yeah. So this lists two vendors.  
6 I understand that the vendors have some  
7 contract with the State of Maryland through  
8 which Harford County Public Schools can get  
9 this software or filtering equipment; is that  
10 correct?

11 A. Yes.

12 Q. Okay. When Harford County Public  
13 Schools has paid money to Skyline Network for  
14 Palo Alto, are those dollars dollars that are  
15 covered by the State of Maryland?

16 A. No. They're covered by my budget,  
17 which is funded from Harford County.

18 Q. Okay. And then the same  
19 question --

20 A. So --

21 Q. Sorry, did I interrupt?

22 MR. LEGG: I don't want to disrupt  
23 your flow. We're about 29 minutes in, so  
24 a few more questions.

25 MR. KEYES: Okay.



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1 BY MR. KEYES:

2 A. So, Mr. Keyes, I just wanted to  
3 state that Skyline and CDW is a contract  
4 vehicle. There is -- the money that is coming  
5 is coming from my budget.

6 Q. Okay.

7 A. They are not subsidized by the  
8 State, if that's what you were asking.

9 Q. Okay. And are you familiar with  
10 CIPA, C-I-P-A?

11 A. Children's Internet Protection Act?

12 Q. Yes. That is a federal law?

13 A. Yes, sir.

14 Q. And do you understand that that  
15 federal law requires school districts to have  
16 technology measures and policies that protect  
17 students from information or materials  
18 considered to be obscene and harmful?

19 A. Yes, sir.

20 Q. And is one of the things that  
21 Harford County Public Schools does to meet the  
22 requirements of CIPA is to have an internet  
23 content filter?

24 A. Yes, sir.

25 Q. So has Harford County Public

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1 Schools had an internet content filter ever  
2 since you arrived in 2000?

3 A. Yes, sir.

4 Q. And since 2000 each year has  
5 Harford County Public Schools paid for an  
6 internet content filter for the purpose of  
7 meeting its obligations under CIPA?

8 A. Yes, sir.

9 Q. And does that include the Palo Alto  
10 software?

11 MR. LEGG: We're past 30, so one  
12 more question.

13 MR. KEYES: Okay.

14 BY MR. KEYES:

15 Q. Well, does that include the Harford  
16 County Public Schools' purchases of Palo Alto  
17 from Skyline Network and its purchases of Cisco  
18 Umbrella from CDW Government, Inc.?

19 MR. LEGG: Objection to form.

20 THE WITNESS: Mr. Keyes, since Mr.  
21 Legg interrupted, could you restate your  
22 question in whole?

23 BY MR. KEYES:

24 Q. Sure.

25 I had just asked you whether

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1 Harford County Public Schools every year during  
2 your tenure has purchased internet content  
3 filters to meet its obligations under CIPA; and  
4 I believe you said yes; is that correct?

5 A. Yes, sir.

6 Q. And do those purchases of an  
7 internet content filter to meet CIPA's  
8 requirements include Harford County Public  
9 Schools' purchases of Palo Alto and Cisco  
10 Umbrella?

11 A. Yes.

12 MR. LEGG: We're 31 in, so I'm  
13 going to call it.

14 MR. KEYES: Okay.

15 BY MR. KEYES:

16 Q. Mr. Moore, thank you for your time.  
17 Off the record. My best to your  
18 family and good luck with the new grandson.

19 THE WITNESS: Thank you, sir. I  
20 appreciate it.

21 MR. KEYES: Thank you.

22 THE VIDEOGRAPHER: Anything else  
23 for the record from counsel?

24 MR. LEGG: I will reserve my  
25 questions for trial.

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1 THE VIDEOGRAPHER: Please stand by.

2 This is the videographer stating  
3 total run time by party for the record,  
4 Andrew Keyes for Google is 31 minutes.

5 This concludes today's video  
6 deposition. We are going off video record  
7 at 2:36 p.m.

8 (The witness is excused.)

9 (Deposition of Andrew Moore  
10 concluded at 2:36 p.m. EDT.)  
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C E R T I F I C A T E

I, SUZANNE J. STOTZ, a Certified  
Shorthand Reporter, Registered Professional  
Reporter, Certified Realtime Reporter, and  
Notary Public in and for the State of  
California, do hereby certify that the  
foregoing is a true and accurate transcript of  
the stenographic above-captioned matter.

*Suzanne J. CCR*

-----  
SUZANNE J. STOTZ, CSR, RPR, CRR  
CA CSR License No. 14565

DATED: May 30, 2025

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## 1 E R R A T A S H E E T

2 I have read my testimony in the foregoing  
 3 transcript and believe it to be true and  
 4 correct to the best of my knowledge and belief  
 5 with the following changes:

6 PAGE LINE CHANGE

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19 WITNESS SIGNATURE DATE

20

21 Sworn and subscribed to before me this

22 ----- day of -----, 2025.

23

24 Notary Public of the

25 State of -----.